

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

DOUVER TORRES BRAGA,
JOFF PARADISE, and
KELEIONALANI TAYLOR,

Defendants.

No. 2:22-cv-01563-TL

**STIPULATION TO EXTEND
DEADLINES**

I. STIPULATION

Plaintiff Securities and Exchange Commission (“SEC”) and the sole appearing Defendant in this matter, Douver Torres Braga, hereby stipulate to an extension of the deadlines for the submission of Initial Disclosures and for the filing of the Joint Status Report by approximately thirty (30) days.

Pursuant to Judge Lin’s Standing Order for All Civil Cases, the Parties have agreed to move the following deadlines.¹ The Parties request that the Clerk reset the deadlines as noticed.

¹ Judge Lin’s Standing Order provides that the Parties are permitted to automatically extend a deadline if, among other things, “the date has not been previously automatically extended.” Standing Order, III. A. The Parties note that these deadlines have not been previously automatically extended, but they were extended once by a joint motion and order by Judge Martinez. Dkt. #38.

Filing/Submission	Current Deadline (Dkt. #38)	New Deadline
Initial Disclosures	March 7, 2025	April 7, 2025
Joint Status Report	March 25, 2025	April 25, 2025

Defendant Braga has requested this extension from the SEC, and the SEC does not oppose the request, because Defendant was recently arrested and presented in the related criminal matter also before this Court, *United States of America v. Braga*, United States District Court for the Western District of Washington, Case Number CR22-169-TL, and requires additional time to evaluate the two related cases.

No party will be prejudiced by extension of these deadlines because no other defendants named in this matter have yet appeared.

DATED this 27th day of February 2025.

The undersigned certify that this memorandum contains 243 words, in compliance with the Local Civil Rules.

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SECURITIES EXCHANGE
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/s/ John K. Han

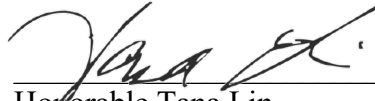
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5 **II. ORDER**

6 IT IS SO ORDERED.

7 DATED this 27th day of February 2025.

8
9 
10 Honorable Tana Lin
United States District Judge